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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

LAUREN HALL, on behalf of herself and others similarly situated, Plaintiff, v. WELCH FOODS, INC., A COOPERATIVE and THE PROMOTION IN MOTION COMPANIES, INC, Defendants.	Civil Action No.: 2:17-cv-03997 **DECLARATION OF JOSH SHAPIRO**

Pursuant to 28 U.S.C. § 1746, I hereby declare as follows:

1.   I am the Senior Vice President of Marketing of defendant The

Promotion In Motion Companies, Inc. ("PIM") in the above-captioned action.

Unless otherwise stated, matters referred to in this declaration are based on my

personal knowledge and, if called to testify as a witness, I could and would testify

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competently to the facts set forth herein.

2.   As Senior Vice President of Marketing, I am responsible for the sales and marketing strategy and implementation for PIM.

3.   I reviewed the Complaint filed against Defendants Welch Foods Inc., A Cooperative ("Welch's") and PIM captioned *Hall v. Welch Foods Inc. and Promotion in Motion, Inc.*, Docket No. L-1334-17 and filed in the Superior Court of New Jersey for the County of Monmouth on April 5, 2017 (the "Complaint").

4.   I also reviewed the First Amended Class Action Complaint filed in the captioned action on June 26, 2017.

5.   Both pleadings discuss "Defendants' reformulation of the Products in 2015". I am familiar with the fact that in or about 2015, Defendant PIM changed the formulation and labeling of certain of its products, including certain products at issue in this action. The "reformulated" products entered the market no later than August of 2015.

6.   I declare under penalty of perjury, that the foregoing is true and correct.

HF 11582815v.2

Executed this 24th day of July, 2017 in Allendale, New Jersey.

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JOSH SHAPIRO

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